

LUCAS VALLEY LAW
MARK K. de LANGIS (SBN 190083)
2110 Elderberry Lane
San Rafael, California 94903
Telephone: (415) 472-3892
Facsimile: (415) 472-3977
mdelangis@lucasvalleylaw.com

Attorney for Plaintiffs
AMERICAN PRESIDENT LINES, LTD. and
APL CO. Pte., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AMERICAN PRESIDENT LINES, LTD., a
corporation, and APL CO. Pte., LTD., a
corporation,

Plaintiffs,

v.

T&T GROUP, INC., a corporation,

Defendant.

No. C 08-05111 SI

**STIPULATED REQUEST FOR
ORDER GRANTING RELIEF FROM
CASE MANAGEMENT SCHEDULE**

Pursuant to Civil Local Rules 6-1(b), 6-2(a), 7-12, and 16-2(d) and (e), plaintiffs American President Lines, Ltd. and APL Co. Pte., Ltd. (collectively "APL") and defendant T&T Group, Inc. ("T&T") request an order granting relief from the Case Management Schedule in the above-captioned matter.

No previous time modifications to the Case Management Schedule have been requested or granted. However, the parties have concurrently filed a Stipulated Request to Further Extend the Time to Respond to Complaint.

The requested enlargement of time/ relief from the Case Management Schedule is sought because APL and T&T seek to explore all avenues of an early disposition of this dispute and are in the process of exchanging documents and information to that end. T&T's counsel has recently provided to APL's counsel a letter brief, including documents, of approximately seventy-five pages, supporting T&T's position in this matter. APL's counsel has not been able to review the documents with his client and/or respond to T&T with regard to the substantive issues raised in T&T's submission. The parties believe it would be beneficial to allow them to seek a possible resolution of the matter, and thereby request relief from the Case Management Schedule. (*See* Declaration of Mark K. de Langis, filed in support of this Stipulated Request.)

IT IS HEREBY STIPULATED by and between plaintiff APL and defendant T&T that the Case Management Schedule shall be vacated and amended to reflect the following dates:

Date	Event	Governing Rule
3/13/2009	Last day to meet and confer re initial disclosures, early settlement, ADR process selection, and discovery plan	FRCP 26(f) ADR L.R. 3-5
3/13/2009	Last day to file Joint ADR Certification with Stipulation to ADR process or Notice of Need for ADR Phone Conference	Civil L.R. 16-8 & ADR. L.R. 3-5(b)
3/13/2009	File either Stipulation to ADR Process or Notice of Need for ADR Phone conference	Civil L.R. 16-8© & ADR L.R. 3-5(b) & (c)
3/27/2009	Last day to complete initial disclosures or state objection in Rule 26(f) Report, file/serve Case Management Statement, and file/serve Rule 26(f) Report	FRCP 26(a)(1) Civil L.R. 16-9
4/3/2009	Case Management Conference in Courtroom 10, 19 th Floor, SF at 2:30 p.m.	Civil L.R. 16-10

1
2 DATED: February 6, 2009

LUCAS VALLEY LAW

3
4
5 By: /s/

6 Mark K. de Langis
7 Attorneys for Plaintiffs
8 AMERICAN PRESIDENT LINES, LTD.
9 APL Co. Pte., Ltd.

10 DATED: February 6, 2009

FENWICK & WEST

11
12 By: /s/

13 Bryan A. Kohm
14 Attorneys for Defendant
15 T&T GROUP, INC.

16 PURSUANT TO STIPULATION, IT IS SO ORDERED

17
18 Dated: _____



19 UNITED STATES DISTRICT JUDGE
20
21
22
23
24
25
26

ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Mark K. de Langis, attest that concurrence in the filing of this Stipulated Request for Order Granting Relief From Case Management Schedule has been obtained from any signatories indicated by a “conformed” signature (/s/) within this e-filed document.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 6th day of February 2009, at San Rafael, California.

/s/_____

Mark K. de Langis